

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: : No.: 20-11063-AMC

John Murtaugh :

Debtor : Chapter: 13

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NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE

John Murtaugh, debtor, has filed a Motion to Reopen with the court.

1. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).
2. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, then on or before **fourteen days from date the of service of this motion**, you or your attorney must file a response to the Motion. (see Instructions on next page).
3. A hearing on the Motion is scheduled to be held on **March 3, 2021, at 11:00 a.m.** in **Courtroom 4¹**, United States Bankruptcy Court, 900 Market Street, Philadelphia, Pennsylvania. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.
4. If you do not file a response to the Motion, the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed a response.
6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed below.

Filing Instructions

7. If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically.

¹ Please consult the court's website <https://www.paeb.uscourts.gov/> for updates regarding court hearings.

8. If you are not required to file electronically, you must file your response at (address of bankruptcy clerk's office)
9. If you mail your response to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 of this Notice.
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Jonathan H. Stanwood, Esq.
Attorney for Debtor
1628 J.F.K. Blvd, Suite 1000
Philadelphia, Pa 19103
(215) 569-1040
JHS@STANWOODLAW.COM

Dated: February 5, 2021

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: : No.: 20-11063-AMC

John Murtaugh :

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O R D E R

AND NOW, upon consideration of the Debtor's motion to reopen, it is hereby

ORDERED that this case is reopened.

By the Court:

Ashely M. Chan
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
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DEBTOR'S MOTION TO REOPEN

1. Movant is John Murtaugh, debtor in the above matter.
2. This case was dismissed on January 13, 2021, on motion by the trustee for failure to make plan payments and the case was closed.
3. Debtor has requested reconsideration of the dismissal order which is pending.
4. In order to enter the requested relief, the case must be reopened.

WHEREFORE, Movant/Debtor respectfully requests that the court enter an order opening this case and accord other relief as is just and proper.

Respectfully submitted,

By: /s/ Jonathan H. Stanwood
Jonathan H. Stanwood
Attorney for Debtor
Dated: February 5, 2021

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Certificate of Service

I, Jonathan H. Stanwood, Esquire, attorney for the debtor, hereby certify that on
the date below I caused a copy of the forgoing Motion to Reopen to be served either
electronically or via first class mail on the following parties:

Via ECF Notification:
Office of the US Trustee
833 Chestnut Street, Suite 500
Philadelphia, Pa 19107

First Class Mail
All creditors in the matrix
(Notice of Motion Only)

Scott Waterman, Esquire
Chapter 13 Trustee

By: /s/ Jonathan H. Stanwood
Jonathan H. Stanwood, Esquire
8 Penn Center
1628 JFK Blvd., Suite 1000
Philadelphia, Pa 19103
(215) 569-1040
Dated: February 5, 2021